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16 Attorneys for WAYMO LLC

17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

19 WAYMO LLC,

20 CASE NO. 3:17-cv-00939-WHA

21 Plaintiff,

22 vs.  
23 **DECLARATION OF FELIPE  
24 CORREDOR IN SUPPORT OF  
25 PLAINTIFF WAYMO LLC'S  
26 ADMINISTRATIVE MOTION TO FILE  
27 UNDER SEAL ITS SUPPLEMENTAL  
28 BRIEF IN SUPPORT OF ITS MOTION  
TO COMPEL UBER SOURCE CODE**

29 Defendants.

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1 I, Felipe Corredor, declare as follows:

2       1. I am an attorney licensed to practice in the State of California and am admitted to  
 3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,  
 4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set  
 5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6       2. I make this declaration in support of Waymo’s Administrative Motion to File Under  
 7 Seal (“Waymo’s Administrative Motion”) confidential information in its Supplemental Brief in  
 8 Support of its Motion to Compel Uber Source Code (Waymo’s Brief”). Waymo’s Administrative  
 9 Motion seeks an order sealing the following materials:

<b>Document</b>	<b>Portions to Be Filed Under Seal</b>	<b>Designating Party</b>
Waymo’s Brief	Highlighted in blue	Defendants
	Highlighted in green	Waymo
Exhibit 1 to Waymo’s Brief	Entire document	Defendants
	Highlighted in green	Waymo
Exhibit 2 to Waymo’s Brief	Entire document	Defendants
	Highlighted in green	Waymo
Exhibit 3 to Waymo’s Brief	Entire document	Waymo & Defendants

16       3. Waymo’s Brief and exhibits thereto contain information that Defendants have  
 17 designated as confidential and/or highly confidential.

18       4. Portions of Waymo’s Brief and exhibits thereto also contain or refer to Waymo’s trade  
 19 secrets. These portions, which Waymo seeks to seal, contain, reference, and/or describe Waymo’s  
 20 asserted trade secrets, including source code. I understand that these trade secrets are maintained as  
 21 secret by Waymo (Dkt. 25-47) and are valuable as trade secrets to Waymo’s business (Dkt. 25-31).  
 22 The public disclosure of this information would give Waymo’s competitors access to in-depth  
 23 descriptions—and analysis—of the functionality of Waymo’s autonomous vehicle system. If such  
 24 information were made public, I understand that Waymo’s competitive standing would be  
 25 significantly harmed. Waymo’s request to seal is narrowly tailored to only the confidential  
 26 information.

1       5. Waymo takes no position on the merits of sealing the designated material, and expects  
2 Defendants to file one or more declarations in accordance with the Local Rules.

3       I declare under penalty of perjury under the laws of the State of California that the foregoing is  
4 true and correct, and that this declaration was executed in San Francisco, California, on October 14,  
5 2017.

6       By /s/ Felipe Corredor  
7                   Felipe Corredor  
8                   Attorneys for WAYMO LLC

9                   **SIGNATURE ATTESTATION**

10      Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the  
11 filing of this document has been obtained from Felipe Corredor.

12      \_\_\_\_\_  
13      */s/ Charles K. Verhoeven*  
14      Charles K. Verhoeven

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